

JOYCE



JACOBS

ATTORNEYS AT LAW

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 23, 1994

via Hand Delivery

William F. Caton, Acting Secretary
Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Reply Comments of Acadian Ambulance Service, Inc. in the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements

Dear Mr. Caton:

Transmitted herewith, on behalf of Acadian Ambulance Service, Inc. ("Acadian"), is an original and nine paper copies of its above-referenced Reply Comments. Acadian wishes each Commissioner to have a personal copy of its Reply Comments, and files an additional five copies.

If there are any questions concerning these Reply Comments, kindly contact the undersigned.

Sincerely,

Steven J. Hamrick

Enc.

f:\clients\rj88\cato9-23.ltr

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SEP 23 1994

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September 21, 1994

Office of the Secretary
Federal Communications Commission
1919 M. Street N.W.
Washington, D.C. 20554

RE: IAD FILE NO. 94-101

Dear Sir:

Enclosed please find the Supplemental Comments of Acadian Ambulance Service, Inc. which I ask that you please review carefully. Also, please file the same into the record of the above captioned matter.

If you have any questions concerning this matter, please feel free to contact me. Thank you for your cooperation in this matter.

Sincerely,

DOMENGEAUX, WRIGHT, MOROUX & ROY

TYRON D. PICARD

TDP:plk
Enclosure
4930P
cc: Mr. Richard Zuschlag

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SEP 23 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

in the matter of

The Use of N11 Codes and
Other Abbreviated Dialing
Arrangements

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CC Docket No. 92-105
IAD File No. 93-02

To: The Commission

**SUPPLEMENTAL COMMENTS OF
ACADIAN AMBULANCE SERVICE INC.**

Acadian Ambulance Service, Inc. has previously filed comments with this Commission with respect to the assignment and use of N11 codes. Acadian Ambulance Service, Inc. (hereafter referred to as "Acadian") files these supplemental comments in response to the conjecture, innuendo and misleading statements contained in comments filed by Caddo Parish Communication District No. 1.

I. **Caddo Parish Communication District No. 1's Comments
Regarding Acadian's Use of 311 is Inaccurate and Misleading.**

In comments filed with this Commission, Caddo Parish Communication District No. 1 raised several false and misleading statements regarding Acadian's actual use of the 311 dialing code. Caddo Parish Communication District No. 1, (hereinafter referred to as "Caddo") raised three speculative arguments regarding Acadian Ambulance's use of the 311 dialing arrangement:

- (a) That citizen confusion relating to the use of 911 would exist;
- (b) That misdialing of the 911 emergency telephone number would exist, and;
- (c) That a reduction in the efficiency of call taking and dispatch operations would exist.

Caddo paints a "doomsday" picture when speculating as to how operation of the 311 number by Acadian will affect Caddo's 911 service district. **However, Caddo conveniently omits one simple fact which renders its entire argument moot; Acadian does not operate ambulance service (and likewise the 311 dialing arrangement) in the Caddo Parish Communication District No. 1.** In fact, Acadian Ambulance does not serve any area (and likewise does not operate the 311 dialing arrangement) within fifty miles of the Caddo Parish Communication District No. 1. In light of this fact, the Commission should be hard pressed to give any credence to Caddo's comments on file with the Commission.

Perhaps a more accurate assessment of the effects of 311 on a 911 communication district should come from an area which has both dialing arrangements. The Lafayette Parish Communication District is located within Acadian Ambulance's service area. In Lafayette Parish, the 311 dialing arrangement has been in effect for nearly 2 months. William Vincent, Director of the Lafayette Parish Communication District, states in a letter addressed to this Commission that Acadian:

"...is currently using this number for non-emergency calls to their service. This usage has not caused any confusion or problems in Lafayette Parish, which is the busiest parish in their service area. We process over 10,000 emergency calls per year for AASI. It has in fact helped call processing as callers seldom dial 911 for non-emergency ambulance transport since they have been provided the new N11 number for that service." (See Exhibit A).

It is apparent that the unsubstantiated allegations of Caddo (whose district has not been affected by Acadian's use of the 311 dialing arrangement) is completely dismantled by the comments of the Lafayette Communication District (whose district has directly experienced the positive effects of Acadian's use of the number).

Arguments raised by Caddo alleging misdials due to the implementation of the 311 dialing arrangement is also unfounded. Mr. Vincent addresses this allegation when stating:

"Opponents of N11 argue that the number of misdials to 911 would increase and that in emergency situations citizens would be confused as to whether they should call 911 or another N11 code. That has not, however, been our experience in Lafayette Parish. Since AASI began using 311 on August 1, 1994, we have not had any increase in the number of non-911 qualified calls (misdials) and our 911 telecommunicators have not noticed any citizen confusion as to which number to dial for emergency assistance."

In summary, Mr. Vincent explains that "so far, our experience with AASI and 311 has shown that its usage has not had any adverse effects on 911 emergency services in Lafayette Parish."

Acadian submits that this Commission should weigh the comments of Lafayette Parish Communication District (who has firsthand knowledge of the positive effects of 311), greater than those filed by Caddo Parish Communication District No. 1, (where Acadian does not operate 311, and 311 cannot have any measured effects whatsoever). Further, this Commission should take note that during the entire lengthy application process for N11 numbers before the Louisiana Public Service Commission, not one single 911 communication district located within Acadian Ambulance's service area voiced any objection about Acadian Ambulance receiving the 311 dialing arrangement.

Since implementation of the 311 dialing arrangement, Acadian Ambulance has detected a fact which Mr. Vincent raised in his letter addressed to this Commission; in rural areas, elderly citizens have ceased calling 911 to schedule non-emergency visits. This has resulted in a decrease in the number of misdials to 911. Acadian continues to be a strong supporter of emergency 911 communication districts. In

fact, Acadian Ambulance Service helped pioneer the first emergency 911 system in the State of Louisiana. In many areas, Acadian serves as a "backup and overflow" center for calls to the emergency 911 service district.

Caddo's allegations that Acadian's use and operation of the 311 number might create an "economic advantage" is flat wrong. The facts reveal that Acadian was awarded a designated non-commercial number by the Public Service Commission, meaning:

- (a) Acadian cannot charge dialers of the number any charge for dialing 311;
- (b) Acadian cannot transfer, sell, or broker the dialing code and has no vested property rights in it.

Any arguments that use of this non-commercial number (specially dedicated by the Louisiana Public Service Commission for health, welfare or governmental use) will render an economic advantage is totally meritless.

Allegations by Caddo that Acadian's use of the 311 dialing arrangement will "encourage them to challenge the publicly established 911 authority in a contest to receive emergency calls from the public" is totally meritless. In fact, Mr. Vincent plainly states when speaking of Acadian, "they are not in competition with any governmental entity." As a further safeguard that Acadian will use the number as intended (i.e. for non-emergency transports in those areas which have 911, and additionally for emergency transports in those areas which do not have 911) the Commission should recognize that the award of this number to Acadian is on a one year trial basis. Therefore, at the end of one year, we will have the opportunity to reflect back and see if all (or even any) of the negative allegations raised by Caddo regarding Acadian's use of the 311 dialing code have come true. Even assuming arguendo, that any or all of Caddo's predictions came true (since after one year in operation a sizable amount of objective proof regarding use of the

number should exists) the Louisiana Public Service Commission at that time could revoke Acadian's use of the 311 dialing code. Thus far, two months into that one year trial period, we know from objective evidence (i.e. letter from Lafayette Parish Communication District) that Acadian's use and operation of the 311 dialing arrangement has had a positive impact on those 911 communication districts located within Acadian's service area.

Although the Louisiana Public Service Commission docket regarding allocation of the N11 service codes remained open for more than one year, Caddo chose not to participate. In fact, Acadian Ambulance first expressed its desire to obtain an N11 code October 15, 1993, some nine months before its three-digit dialing arrangement was awarded. At no time during that nine month period, did Caddo Parish (or any other communication district) raise any objection to Acadian being awarded a three-digit dialing code. Therefore, Caddo's allegation that "nothing prepared Caddo Parish for actions by the Louisiana Public Service Commission in P.S.C.'s Docket No. U-20222" is patently misleading. Since Acadian's desire to obtain the three-digit dialing arrangement was a matter of public record and on file at the Commission for over nine months prior to the number being awarded (without objection) Caddo cannot claim innocence or lack of knowledge about Acadian's long standing desire to obtain a three-digit dialing code.

Further, Caddo's statement that "the Public Service Commission action was taken without recognition or consideration of the potential adverse impact on 911 districts in that area" is also patently false. In Acadian's "Application for Designated Non-Commercial N11 Number" (see Exhibit B) Acadian states in the second paragraph that:

"In parishes which have an existing 911 emergency medical service, the 311 digit number would not supplant that service, but merely act as a supplement to it. Specifically, in those instances the 311 number would primarily be used to access non-emergency transportation."

The concern over a harmonious and cohesive use of the 311 dialing arrangement in conjunction with existing 911 services has been the primary concern of Acadian Ambulance, and the Louisiana Public Service Commission.

Caddo's allegation that Acadian began using a "membership" solicitation mailing (i.e. the REZ Gram) regarding this number is also false. The REZ Gram is an in-house publication sent only to Acadian employees. It is not distributed to the public or even to members of Acadian Ambulance Service. Admittedly, a typographical error exists in this in-house publication, as the word "emergency" should have been omitted from the first sentence. However, further in the text of the statement, Acadian specifically states that:

"We want to educate and encourage as many people as possible to call 311 when needing an ambulance for non-emergencies, and we still encourage the public to call 911 for emergencies. In the event that someone dials 311 for an emergency or if they need other emergency services, we will relay the information to the appropriate public safety agencies."

Acadian's ability to relay emergency calls inadvertently received via 311 is made possible by Acadian's highly trained dispatchers, all of whom have been APCODE certified, and all of whom personally answer each call received over the 311 line.

It is interesting to see how the 311 dialing arrangement has been grasped by the citizens and media in Acadian's service area. The Daily Advertiser, which is the daily newspaper of Lafayette, Louisiana, in an editorial, heralded the service as a "Pacesetter for the Nation." (See Exhibit C). Clearly, solid community support exists behind Acadian's use of the 311 number, in all of Acadian's service area.

A recent article in the publication EMS INSIDER, September 1994 issue, titled "Where Have All the Patients Gone?" chronicled the problems which 911 systems faced as they are "deluged daily with thousands of non-emergency calls." (See

Exhibit D). In the article, Richard Lazar, an attorney who was formally an EMS director and who was recently elected Chairman of the National EMS Alliance stated that:

"Many local 911 agencies are undertaking similar strategies. The goal; prevent those without emergency needs from calling 911, thus reducing the unwarranted use of costly public resources."

By use and publicity of the 311 dialing arrangement for non-emergency transports, Acadian Ambulance is currently doing what Richard Lazar (Chairman of the National EMS Alliance) and Bill Vincent (Chairman of the Lafayette Parish Communication District) have ranked as a problem for 911 service districts - reducing the number of non-emergency calls which constantly plague 911 communication districts. By educating the public to dial 311 for non-emergency transports, Acadian will save the time and precious resources of 911 communication districts, allowing those districts to focus on emergency calls where time is truly of the essence.

By alleviating the burden of non-emergency calls from the backs of 911 service districts in Acadian's service area, those communication districts should begin to operate more efficiently as they are able to focus solely on emergency transportation, rather than rerouting non-emergency transports.

In summary, Caddo raises conjecture and unsubstantiated allegations regarding the effect of Acadian's 311 dialing code vis'-a-vis' 911 service districts. As described above, the facts prove that the 311 dialing code has been widely accepted in Acadian's service area (of which the Caddo Parish Communication District is not a part of) as well as widely accepted by the largest 911 communication district in Acadian's service area (Lafayette Parish Communication District). The comments of William Vincent, Director of Lafayette Parish Communication District unequivocally

proves that the speculation and conjecture regarding use of the 311 dialing code vis'-a-vis' 911 service districts as raised by Caddo Parish Communication District No. 1, is completely unsubstantiated. To the contrary, use of the 311 dialing arrangement has greatly reduced the burden of non-emergency calls to 911 service districts, thus allowing 911 service districts to more efficiently perform the task for which they were created - responding to the need for emergency transports.

Respectfully submitted:

DOMENGEAUX, WRIGHT, MOROUX & ROY



TYRON D. PICARD

Attorney for Acadian Ambulance Service, Inc.

P.O. Box 3668

Lafayette, Louisiana 70502

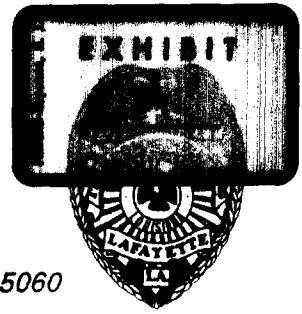
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4930P



Lafayette Parish Communication District

Parish Courthouse • P. O. Box 31014, Lafayette, Louisiana 70593 • (318) 268-5060



September 16, 1994

RECEIVED

SEP 23 1994

Office of the Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

RE: IAD FILE NO: 94-101

In response to the FCC Public Notice dated June 17, 1994, relative to the assignment of N-1-1 Codes, my position as Director of the Lafayette Parish Communication District (District) is that I am not opposed to the assignment of 3-1-1 to Acadian Ambulance Service, Inc. (AASI). AASI is the Emergency Medical Service provider for Lafayette Parish.

The District was created for the express purpose of establishing and administering an emergency telephone system (9-1-1) that would enable the citizens of our parish to have quick access to emergency assistance when they need help from law enforcement, fire, ambulance, or a number of other emergency service agencies.

As part of our responsibility, our 9-1-1 Public Safety Answering Point interacts with the AASI Communications Center on a professional basis 24 hours a day. Critical response information is continuously being exchanged utilizing the latest telecommunications technologies. AASI has always been a strong advocate of 9-1-1 encouraging its implementation throughout the area. In fact, AASI played a leading role in the establishment of the first enhanced 9-1-1 system in the State of Louisiana in Lafayette Parish. AASI serves side by side with our 9-1-1 center, law enforcement, fire, and other governmental response agencies as an integral partner in emergency response in Lafayette Parish. They have been providing services to south central Louisiana for over 20 years and have been recognized nationally as a leader in the emergency medical services field.

In Lafayette Parish, as in most of the other areas they serve, Acadian is much more than just an ambulance service. They are an emergency medical service provider, providing paramedic response and advanced life support. They are not in competition with any governmental entity. In addition to this emergency medical service, AASI also provides non-emergency ambulance service. AASI was recently awarded a N-1-1 number by the Louisiana Public Service Commission and is currently using this number for "non-emergency" calls to their service. This usage has not caused any confusion or problems in Lafayette Parish, which is the busiest Parish in their service area. We process over 10,000 emergency calls per year for AASI. It has in fact helped call processing as callers seldom dial 911 for "non-emergency" ambulance transport since they have been provided the new N-1-1 number for that service.

Federal Communications Commission
September 16, 1994
Page 2

Opponents of N-1-1 argue that the number of misdials to 9-1-1 would increase and that in emergency situations citizens would be confused as to whether they should call 9-1-1 or another N-1-1 code. That has not, however, been our experience in Lafayette Parish. Since AASI began using 3-1-1 on August 1, 1994, we have not had any increase in the number of non-9-1-1 qualified calls (misdials) and our 9-1-1 Telecommunicators have not noticed any citizen confusion as to which number to dial for emergency assistance.

It is our understanding that the Louisiana Public Service Commission will monitor N-1-1 number usage for one year and obtain public input regarding same. So far, our experience with AASI and 3-1-1 has shown that its usage has not had any adverse effects on 9-1-1 emergency services in Lafayette Parish.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. R. Vincent", with a stylized flourish at the end.

William R. Vincent
Director

WRV/lal



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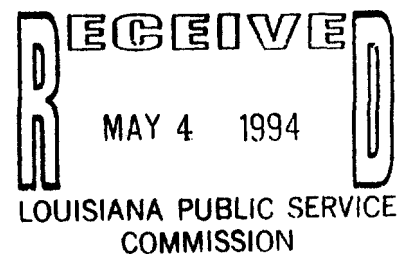
James Domengeaux (1907-1988)
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Telephone (318) 233-3033
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May 4, 1993

HAND DELIVERED

Louisiana Public Service Commission
Utilities Division
Executive Session
Attention: Marshall Brinkley
One American Place
Suite 1630, 16th Floor
Baton Rouge, LA 70825



Re: South Central Bell N11 Service Tariff
Docket No.: U-20222

Dear Mr. Brinkley:

Enclosed please find the original and one (1) copy of the Application for Designated Non-Commercial N11 Number to be filed on behalf of Acadian Ambulance Service, Inc. I ask that you please file same into the record of the above captioned matter. Also, I ask that you return a conformed copy of same to my office.

If you have any questions concerning this matter, please feel free to contact me.

Sincerely,

DOMENGEAUX, WRIGHT, MOROUX & ROY

A handwritten signature in cursive script, appearing to read "Tyron D. Picard".
TYRON D. PICARD

TDP:plk/4930P
Enclosure
cc: All Public Service Commissioners

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

SOUTH CENTRAL BELL
TELEPHONE COMPANY,

DOCKET U-20222

EX PARTE

RE: INTRODUCTION OF N11 SERVICE,
A THREE DIGIT DIALING ARRANGEMENT,
AVAILABLE IN SPECIFIC AREAS FOR
DELIVERY OF GENERAL INFORMATION
VIA VOICE GRADE FACILITIES

APPLICATION FOR DESIGNATED NON-COMMERCIAL N11 NUMBER

Name of Applicant

Acadian Ambulance and Air Med Service, Inc.

Request for Information No.1:

Applicant shall disclose how their plan would further the public interest.

Acadian Ambulance Service, Inc. seeks the reserved non-commercial three-digit number (311) in order to allow easier consumer access to ambulance service in the State of Louisiana. Acadian envisions statewide access to ambulance services by simply dialing 311 if granted this number.

Acadian's use of this number would further the public interest by facilitating easier access and a more rapid deployment of ambulance service. In parishes which have an existing 911 emergency medical service, the three-digit number would not supplant that service, but merely act as a supplement to it. Specifically, in those instances the 311 number would primarily be used to access non-emergency transportation. An overwhelming percentage of Acadian's daily transports are of elderly and infirm individuals needing transport of a non-emergency nature. By simply having to dial three-digits, these transports

will be facilitated much easier for those elderly and infirm individuals seeking non-emergency transportation.

Request for Information No. 2:

Applicant shall disclose the anticipated cost it expects to incur in providing N11 service, and also submit documentation evidencing financial ability to implement N11 service within sixty (60) days of assignment.

Acadian Ambulance Service projects its monthly costs of providing free N11 service to be approximately \$5,000.00 to \$7,500.00. After consultation with executives of South Central Bell, Acadian feels comfortable that this is a reasonable projection. With respect to financial ability, Acadian would direct the Commission's attention to the confidential letter disclosing financial information, prepared by the auditing firm of Ernst & Young. As indicated by Senior Auditor, Ron Updegraff, a review of Acadian's revenues and internal expenses indicates that the projected N11 expense represents .1% of Acadian's (i.e. 1/10 of one percent) annual expenses. Further, Acadian's annual revenues far exceed the total costs (as described above) which would be commensurate with the provision of this service. Should the Commission request additional financial data, Acadian would be happy to provide the same on a confidential basis.

David Pierce, Sr. Vice President of Operations for Acadian Ambulance Service, Inc., estimates Acadian's inhouse cost of implementing this service to be approximately \$50,000.00. This includes new equipment purchases as well as the rearrangement of the current inhouse telecommunications systems. In addition to this one-time expense, it is also estimated to cost approximately \$4,500.00 to \$5,000.00 per month for dedicated circuits to carry these calls

to Lafayette from the central offices in New Orleans, Baton Rouge, Shreveport and Lafayette.

Acadian Ambulance has been working with South Central Bell to establish the procedures for 311 service within the State of Louisiana. It is anticipated that the service will require a special arrangement that incorporates the 311 number as well as several other services and special procedures. The preliminary estimate is a rate of \$.15 to \$.17 per call, (\$5,000.00 to \$7,500.00) billing per month, and a one-time installation fee of between \$50,000.00 to \$100,000.00.

Request for Information No. 3:

Applicant shall disclose the service they intend to provide and the type of information which would be disseminated via the N11 service applied for.

Acadian Ambulance Service envisions linking the three-digit number (311) to its Centralized Communication Center in Lafayette, Louisiana. This shall be made possible via 4 statewide South Central Bell calling stations (Shreveport, Baton Rouge, Lafayette, New Orleans) which shall relay calls to Lafayette instantaneously. Likewise, any consumer statewide who dials 311 for ambulance service would be linked directly to the Centralized Communication Center, which would then be able to dispatch the nearest available ambulance to that consumer in need. Emergency as well as non-emergency transportation shall be accessible via the 311 dialing arrangement. However, as stated above, in parishes which currently have an existing 911 emergency dialing arrangement, the 311 number will simply supplement that service and be geared primarily towards non-emergency transportation.

It is the hope of Acadian Ambulance that by simply having to remember three-digits, consumers and those in need might have more rapid access to

ambulance service, due to a decrease in the time between the occurrence of accident or injury and the placement of a call requesting ambulance service. Acadian herein confirms that the three-digit dialing arrangement will be used solely for the dispatch of ambulance services requested by consumers throughout the state.

Request for Information No. 4:

Applicants shall have a proven record of reliable information services provision which the Commission can easily verify.

While this request is not applicable to Acadian Ambulance, (as it is an ambulance service and not an information provider), Acadian wishes to share with the Commission its record of accomplishment. Acadian Ambulance has been awarded the United States Senate Innovation Award for its ambulance and air med services. Acadian Ambulance, in the October 1993 issue of *The Journal of Emergency Medical Services*, was named the best ambulance service in the Nation, by publisher James O'Page. Recently, Acadian Ambulance received the Theodore Schad Business Achievement Award (presented to the outstanding individual business in Southwest Louisiana) sponsored by *The Times of Acadiana* newspaper.

Additionally, Acadian Ambulance has a long standing civic commitment with involvement in various charity organizations as well as offering standby services to numerous civic events, festivals, high school and collegiate athletic contests, etc.

Acadian Ambulance is locally owned by Richard Zuschlag of Lafayette, Roland Dugas of Lafayette and Richard Sturlese of Grand Chenier, Louisiana.

Request for Information No. 5:

Applicants shall affirmatively state that they will be able to provide N11

service within sixty (60) days of the date the N11 number is assigned to it and, consistent with SCB Tariff A39, that the applicant will be billed a non-recurring charge at that time.

Richard E. Zuschlag, Secretary/Treasurer of Acadian Ambulance has participated in thorough and frequent negotiations with South Central Bell regarding the operational aspects of this dialing arrangement as well as the time frame necessary for implementation of the service. As such, Mr. Zuschlag can unequivocally state that barring some unforeseen delay on the part of South Central Bell, Acadian Ambulance shall be able to provide N11 service within sixty (60) days of the date that the number 311 is assigned to Acadian Ambulance.

Due to the hybrid nature of the service to be provided by Acadian Ambulance via of the 311 number, Acadian is currently in negotiations with South Central Bell with respect to an acceptable rate. Acadian herein pledges that should it be granted the 311 number, it will abide by all rates and fees which the Commission deems appropriate for use of the non-commercial number. As stated above, Acadian anticipates an initial nonrecurring charge of between \$50,000.00 to \$100,000.00.

Request for Information No. 6:

Applicants shall affirmatively state their long term commitment to provide N11 service.

Acadian Ambulance commenced operations over 20 years ago with 8 employees and 2 ambulances, serving only Lafayette Parish. Today, Acadian Ambulance Service provides emergency response personnel, emergency medical transportation and non-emergency transportation through some 23 parishes (or 15,000 square miles) throughout the State of Louisiana. Acadian employs

approximately 1000 people and currently has 148,000 membership subscribers. The population area served by Acadian Ambulance includes 1.6 million people. Acadian has grown from the original 2 ambulance operation to now having 58 ambulance satellite stations, 17 offshore medical satellite stations, 140 ambulances, 3 helicopters and 2 fixed wing aircraft.

It is the commitment of Acadian Ambulance to not only continue to enhance its current service area for many years to come, but also to reach out to those current areas unserved by Acadian Ambulance. Therefore, Acadian herein unequivocally states that it will provide N11 service (via the 311 non-commercial number) without suspension or interruption as long as the Public Service Commission allows Acadian the use of this number.

Request for Information No. 7:

Applicants shall affirmatively state their understanding of the potential for any N11 number assigned to it by this Commission to be recalled by the NANP (North American Numbering Plan) administration, the Federal Communications Commission, or the Louisiana Public Service Commission.

Acadian Ambulance understands that its decision to invest time, equipment and money into the operation of an N11 number is completely at its own peril. Acadian understands that the number could be subject to revocation by the NANP, the Federal Communications Commission, or the Louisiana Public Service Commission at any time. Understanding this risk, Acadian Ambulance still remains committed in its desire to obtain the three-digit dialing arrangement 311 for non-commercial use.

Request for Information No. 8:

Applicants shall affirmatively state that there will be no charge to customers for use of the 311 number.

Acadian Ambulance Service Inc. herein affirms to this Commission that it will operate the 311 number dialing arrangement at no charge to any user (whether a member of Acadian Ambulance Service or not). Acadian Ambulance Service herein affirms that all costs in operating the system (including equipment, manpower, etc.) shall be borne by Acadian Ambulance Service alone.

Request for Information No. 9:

Applicants shall state their name, address, telephone number and principal contact person.

Richard E. Zuschlag,
Secretary/Treasurer of Acadian Ambulance Service, Inc.
302 Hopkins Street, P.O. Box 98000
Lafayette, Louisiana 70509-8000
(318) 267-3333

Tyron D. Picard, Legal Counsel
Domengeaux, Wright, Moroux & Roy
P.O. Box 3668
Lafayette, Louisiana 70502
(318) 233-3033

Request for Information No. 10 (Special to non-commercial applications):

Applicant shall affirmatively establish that application is being made solely for non-commercial use related to health, safety, welfare, or governmental use and shall also demonstrate a net worth sufficient to support financial stability and a minimum service demand of 10,000 calls per month.

As indicated in earlier responses to request for information, Acadian Ambulance's sole use of the designated non-commercial N11 number will be for the betterment of the health, safety and welfare of the citizens of Louisiana. As earlier stated, the sole use of this number will be to allow easier access to ambulance services by the general public as well as more

rapid deployment and dispatch of an ambulance in those crisis situations. Acadian Ambulance asserts that it is the only non-commercial applicant which, by use of this non-commercial number, will improve the welfare of millions of citizens throughout the state. Since Acadian, has remained in Louisiana for over 20 years (including the turbulent economic times of Louisiana throughout the 1980's), Acadian is committed to remaining a solid corporate Louisiana citizen.


The report of Ernst & Young auditor Ron Updegraff (attached as an exhibit) indicates the strong financial health of Acadian Ambulance, and its ability to implement and operate a non-commercial three digit service with great financial ease. (Due to the competitive nature of the ambulance business, Acadian would prefer not to disclose actual numbers but rather provide the Commission with conclusions reached by the independent auditor. However, should the Commission desire specific numbers as to Acadian's financial stability, Acadian shall be happy to provide the same to the individual Commissioners on a confidential basis).

Acadian Ambulance Service exceeds the criteria established for non-commercial applicants which requires a minimum service demand of 10,000 calls per month. David Pearce, Senior Vice-President of Operations of Acadian Ambulance affirms that Acadian Ambulance receives between 1,650 and 1,700 calls at its Centralized Communication Center in Lafayette on a daily basis. This figure includes emergency as well as non-emergency transports. The Commission will note that this totals over 600,000 calls per year, handled by Acadian's Centralized Communication Center (or about 50,187 calls per

far in excess of the 10,000 call per month criteria established by the Commission. (See attached letter from David A. Pearce).

Respectfully submitted:

DOMENGEAUX, WRIGHT, MOROUX & ROY



TYRON D. PICARD
P.O. Box 3668
Lafayette, Louisiana 70502
(318)233-3033

4930P

APR 19 1994

April 18, 1994

Mr. Richard E. Zuschlag
Secretary-Treasurer
Acadian Ambulance Service, Inc.
Post Office Box 98000
Lafayette, Louisiana 70509-8000

Dear Richard:

In connection with the filing of the application for 311 services by Acadian Ambulance Service, Inc. with the Public Service Commission of the state of Louisiana, you have requested that we prepare a letter to you discussing the implication of an additional financial commitment on the part of the Company.

You have represented to us that the addition of the 311 service to the Company's telephone system will increase annual expenses by \$60,000. This amount is the difference between the present telephone costs incurred for the 800 in bound telephone service and the additional costs of adding the 311 service. The sum of \$60,000 represents an additional cost equal to .1% of the total expenses of the Company as reported in the Company's audited financial statements for the year ended February 28, 1993. We are currently in the process of auditing the financial statements for the year ended February 28, 1994, but the engagement has just begun and will not be completed for at least another month. However, using the unaudited financial statements as of and for the year ended February 28, 1994, the total operating expenses of the Company would have been increased by .1% of total expenses.

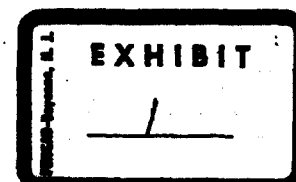
Had the Company had to incur the additional \$60,000 expense in its years ended February 28, 1993 and 1994, the Company would still have had net income more than 10 times this amount.

Sincerely,



Ronald R. Updegraff
Partner

RRU:ze





Acadian Ambulance Service, Inc.

Air Med Services



P.O. Box 98000 • LAFAYETTE, LA • 70509-8000

EMERGENCY
318 267-1111
504 267-1111
800 259-1111

BILLING
318 267-2222
504 267-2222
800 259-2222

ADMINISTRATION
318 267-3333
504 267-3333
800 259-3333

April 15, 1994

Mr. Tyron Picard
P. O. Box 3668
Lafayette, LA 70502

Dear Tyron:

I estimate that we receive between 1650-1700 calls in our Centralized Communication Center on a daily basis. All of these calls pertain to arranging medical transportation. This includes both emergencies and scheduled transports. It is not uncommon to receive several phone calls for one patient transport because of the delicate nature of our business. We often have to verify emergency directions, doctor's orders and appointments, or help guide elderly patients in making their transportation arrangements.

If you have any additional questions, please call me at 267-1583.

Sincerely,

David A. Pierce
Sr. Vice-President, Operations

da



"Dedicated to making Acadiana
a better place to live."

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311 number national first

THE ISSUE:

A new system for easier access to ambulance
service

WE SUGGEST:

Acadian, Bell South and the PSC have given us a
position of national leadership

Louisiana, wonderful state that it is, has never been known as a trailblazer and pacesetter for the nation. In ambulance service, however, we have seen a level of excellence by Acadian Ambulance that other states attempt to emulate. It has been described as the country's best. Now, through the joint efforts of Acadian, the Public Service Commission and South Central Bell, we have again taken a position of leadership.

These organizations have worked together to



give our area the nation's first three-digit telephone number for use in accessing non-emergency ambulance service. Their cooperation has not only provided a service that will immensely benefit the area, but also permits us a certain amount of pride in being ahead of the rest of the nation for a

change. *The Advertiser* commends the officials of Acadian Ambulance Service for seeking the service, South Central Bell for making it technologically and financially feasible, and Public Service Commissioners Kathleen Blanco, Tommy Powell, John Schwegmann and Irma Dixon, who voted to award the 311 number.

On August 1, the service became a reality in Acadian's 23-parish service area. It will substantially benefit the 1.6 million people served by the company.

Seventy-five percent of the patients transported by Acadian are non-emergency cases, predominantly elderly people. Many have physical limitations which make even the use of the telephone a difficult task. A large number of them still use rotary phones.

With the 311 number, the task becomes infinitely easier. Also, the 311 system will allow Acadian to set up a program whereby callers will be automatically identified, and pre-programmed information such as special health conditions and precautions, along with directions to the home of the caller, will be provided automatically to the dispatch center.

Acadian is picking up the tab for 311 calls to the dispatch center. In commercial operation of the three-digit system, there is a charge to the caller, which is split between the phone company and the company with the three-digit number. Acadian will absorb the cost.

Only non-emergency calls should be placed on the 311 number, unless the emergency obviously requires ambulance service only. Most emergencies demand response by multiple agencies — ambulance, fire, police and others — and such calls should continue to go to 911. Acadian is not attempting to dilute the effectiveness of the 911 system.

The 311 number, in combination with a \$2.5 million upgrade of its communication facilities over the next 24 months, will give Acadian a communications system unequalled anywhere in the U.S. — another first.

From the files



A shabby display of pa

Our government is a three-legged stool, upheld by the Executive, the Judicial and the Legislative, with each watchdogging the other.

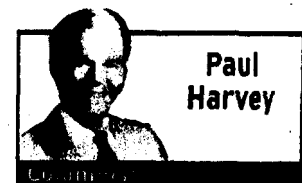
But when the White House and the Congress are dominated by the same party, the "stool" becomes — to say the least — "undependable."

Americans have recently been watching committees of the Senate and House presumably "investigating" Whitewater.

Instead, the dominant Democrats on the committee have been choreographed to perform a whitewash.

Each, allotted five minutes for questioning witnesses, has chosen to take his or her time praising the president, scorning the "wasteful" hearings and condemning the Republicans who dare to impugn the righteousness of the Clintons.

The Wall Street Journal has called these "the coverup hearings," noting that 99 percent of the alleged hanky-panky in Arkansas



Paul
Harvey

has deftly been delegated by the White House to an appointee of the White House.

The five-minute limit for each questioner was designed to favor the majority, and it worked precisely as planned.

Most Democrat congressmen used up their time with praise for the president and soft questions for witnesses.

When a Republican sought to probe witnesses in depth, Chairman Henry Gonzalez of Texas brusquely banged his gavel, announcing, "That question is outside the parameters of this hearing."

Administration witnesses further

She will be follicly disad

A male chauvinist would take delight in Shannon Faulkner's distress. Being a more enlightened sort, I offer her understanding and compassion.

Ms. Faulkner is the young woman who went to court to become the first female cadet to attend the Citadel, a respected old military college in South Carolina.

Because the school is state-funded, a federal judge agreed with the ACLU, which represented Ms. Faulkner, that she was entitled to join the 2,000 male cadets at the college.

The Citadel fought her suit, saying that having a female creature in the program would be a terrible pain because she could not deal with the awful military grind.

Ms. Faulkner's lawyers chortled



Mike
Royko

tion spent millions of pre-inflation dollars on Brilliantine, Wildroot Creme Oil and various smelly pomades that gave us the greasy duck-tail look that was high fashion at the time.

So it was traumatic for us to go back to the barracks, look in the mirror and see what appeared to be a new-born bird with gigantic ears looking back.

But there were valid reasons for